

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: SANOFI-AVENTIS SECURITIES LITIGATION

07-CV-10279 (GBD);
08-CV-00021 (GBD)

CLASS ACTION

This document relates to:

ECF CASE

ALL ACTIONS


**DECLARATION OF MATTHEW C. VOGELE IN SUPPORT OF
DEFENDANTS' MOTION FOR ISSUANCE OF LETTER
OF REQUEST, APPOINTMENT OF COMMISSIONER AND
DIRECTION OF SUBMISSION OF HAGUE CONVENTION APPLICATION**

Pursuant to 28 U.S.C. § 1746, Matthew C. Vogele declares:

1. I am a member of the Bar of this Court and an associate of Cleary Gottlieb Steen & Hamilton LLP ("Cleary"), counsel for defendants Sanofi, Gérard Le Fur and Hanspeter Spek (collectively, "Defendants") in this action.
2. I submit this Declaration in support of Defendants' Motion for Issuance of Letter of Request, Appointment of Commissioner, and Direction of Submission of Hague Convention Application.
3. The proposed Order Granting Motion, Issuing Letter of Request, Appointing Commissioner and Directing Submission of Hague Convention is attached as Exhibit 1.
4. The proposed Request for International Judicial Assistance Pursuant to Chapter II of the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters is attached as Exhibit 2.

5. Counsel for the plaintiffs has represented to me that the plaintiffs do not oppose this motion.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of October, 2011.



Matthew C. Voge